

# Exhibit 3

**AFFIDAVIT and DECLARATION OF MICHELLE ZUCKERMAN-PARKER**

Dr. Michelle Zuckerman-Parker, being duly sworn, declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a resident of Pittsburgh, Pennsylvania, in Allegheny County.
2. I voted in the 2016 general election in my district, Precinct 14-19.
3. I voted by absentee ballot and hand delivered the ballot to the Allegheny County

Board of Elections. As such, I cannot be sure that my vote was accurately included in the November 8, 2016 Presidential Election.

4. My husband, Steve Parker, voted at our local precinct, in Pittsburgh at 14-19 using the DRE Machine on November 8, 2016.

5. I have worked in manufacturing environments as a Quality Engineer, coached high school students in annual "Data Jam" competitions, taught statistics at Duquesne University, earned a doctorate in instructional technology, and work as a humanitarian engineering consultant to provide opportunities for greater equity using substantiated facts in evidence-based research and routinely dig for data.

6. I submit this affidavit/declaration to explain the hurdles I have faced in trying to seek a recount of votes in Allegheny County.

7. On Sunday, November 27, I helped coordinate the gathering of over 200 affidavits from Allegheny voters seeking a recount of votes and a forensic audit of the electronic voting machines in the county. I personally stated to each person who I met, over 150 people, my concern about the integrity of the vote based on my analysis of the voting returns and the vulnerability to hacking and interference. Each person I spoke with stated they shared the same concerns and was grateful to hand over their notarized documents for me to file on their behalf. I paid \$100 at a local copy shop to print out the affidavits and supporting paperwork from J. Alex

Halderman, a computer security expert. After I left the meeting at 8:30 p.m., voters continued to drop off petitions at my house until 1:30 a.m.

8. I spent hours that night organizing and collating the hundreds of petitions by precinct. Attached as Exhibit A is a blank sample petitions I filed.

9. At 8:00 a.m. on Monday, November 28, I took the more than 200 petitions I had collected to the County Board of Elections.

10. The first employee I met there, named David, told me that I was in the wrong place and could not file the petitions. He then asked a co-worker, Mark, who also told me I was in the wrong place. They stated I should go to the County Clerk's office to file with the Court of Common Pleas.

11. Soon thereafter, the county solicitor arrived. He referred to the state statute and confirmed that I was in the right place, that the Board would accept my petitions, and that there was no fee to file the petitions.

12. I was allowed to sit at a table in a conference room and log and take photographs of each time-stamped petition filed with the Board that day. I was there from 8:30 a.m. until 5:00 p.m.

13. At the end of the day, I asked the Board staff what the next steps would be. No one was able to give me an answer.

14. I never received any other notification from the Board about a recount or court hearing.

15. Later that week, other voters who had filed petitions called me to tell me they had received a 400-plus page document in the mail regarding a court hearing scheduled for Friday,

December 2, 2016. I received this same package late in the afternoon of December 2, after the hearing had concluded.

16. The first page of the package was a letter from a lawyer named Ronald L. Hicks, Jr. Mr. Hicks did not specify in the letter who he represents, but the rest of the package suggested that he represents the local Republican Party, which had filed a motion to stop the recount in Allegheny County. Attached as Exhibit B is a true and correct copy of the letter I received signed by Mr. Hicks.

17. The letter states that a hearing was scheduled for December 2, 2016, and includes this sentence: "You are hereby notified to appear and be heard."

18. The package included a list of dozens of petitioners and includes their home address. This was sent to hundreds of petitioners.

19. Many people who called me interpreted this as a subpoena ordering them to come to court. They told me they felt intimidated and scared. Because I had not yet received the package, I could not tell them one way or the other whether they were required to attend the court proceeding.

20. I was angry that my address, and the address of so many other petitioners, was sent to hundreds of people in my town, without any notice to us that this would happen.

21. I have been surprised by the difficulty of seeking a recount. I believe there is evidence that the election in Pennsylvania and elsewhere was subjected to cyber-attack or other malicious interference. Because of this, the electronic voting machines must be forensically reviewed to look for any sign of malicious tampering with the voting process. That is why I have worked so hard to organize a recount and forensic review of dozens of precincts in Allegheny county.

22. I am concerned that my vote and the votes of my fellow citizens were not counted accurately in the election, and would like a manual recount of every paper ballot and a forensic examination of the electronic voting to ensure the election had integrity and that every vote was fairly counted.

Dated: December 4, 2016  
Pittsburgh, Pennsylvania

  
MICHELLE ZUCKERMAN-PARKER

Sworn to and subscribed before me  
this \_\_\_\_ day of \_\_\_\_\_, 2016.

\_\_\_\_\_  
NOTARY PUBLIC

## **Exhibit A**

**COMMONWEALTH OF PENNSYLVANIA**  
**COUNTY OF \_\_\_\_\_**

**PETITION TO RECOUNT AND/OR RECANVASS**  
**AND AFFIDAVIT OF [your name] \_\_\_\_\_**

**TO THE \_\_\_\_\_ COUNTY BOARD OF ELECTIONS, [name of**  
**county]\_\_\_\_\_, PENNSYLVANIA:**

\_\_\_\_\_, verifies, deposes and says the following under penalty of  
perjury:

1. My name is \_\_\_\_\_. I am a registered voter in City, Borough,  
Township of \_\_\_\_\_, Precinct [insert number] \_\_\_\_\_,  
\_\_\_\_\_ County, Pennsylvania. I voted in this district in the election on  
November 8, 2016. I live at [insert complete street address]  
\_\_\_\_\_, \_\_\_\_\_ County, Pennsylvania.

2. Pursuant to 25 P.S. § 3154, I request a recount and recanvass of the vote for  
President of the United States and for United States Senate in the November 8, 2016 election in  
this district.

3. I believe that an error, although not apparent on the face of the returns, has been  
committed in the vote in this district. I also believe there is a discrepancy in the returns of this  
district.

4. My belief is based, in part, on the attached Affidavit of Alex Halderman, which  
raises grave concerns about the integrity of DRE voting machines used in this district. *See Ex. A*  
(attached).



5. I request that the county board not just recanvass the votes cast on the DRE machines, but do a forensic analysis of the software and media inside the machines, to determine whether the machines have been hacked or tampered with. As the Halderman affidavit makes clear, merely recanvassing the votes on the machines will not detect whether the machines have been compromised.

6. At minimum, I request that a reasonable subset of the DRE machines be forensically analyzed by appropriate computer experts for potential tampering, malware, and/or hacking.

7. As a voter, and as a citizen of this country, I believe it is extremely important that votes are counted accurately in this election.

8. I hereby verify under penalty of perjury that the facts contained in this petition and affidavit are true and correct to the best of my knowledge or information and belief.

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[signature]

Sworn to before me this \_\_\_\_\_ day of November 2016.

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Notary Public

### **VERIFICATION**

I hereby depose and say that the statements in the foregoing Petition to Recount and/or Recanvass are true and correct to the best of my knowledge, information and belief. I understand that this statement is made subject to the penalties of 18 Pa. C. S. Sec 4904 relating to unsworn falsification to authorities.

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[signature]



## **Exhibit B**



**MEYER UNKOVIC SCOTT**  
ATTORNEYS AT LAW

Writer's direct dial phone number and e-mail address:  
412-456-2837 ~ rlh@muslaw.com

November 30, 2016

TO: VOTER (See attached)

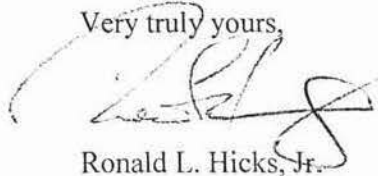
RE: In Re: Recount and/or Recanvass of the Vote for President of the United States  
Senate in the November 8, 2016 General Election  
No: GD 16-022954

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Dear Sir/Madam:

Enclosed please find a copy of the Notice of Appeal and Emergency Petition that was filed today in the Court of Common Pleas of Allegheny County, Pennsylvania. A hearing on the appeal/petition will be held at 11:00 a.m., this Friday, December 2, 2016, before the Honorable Joseph M. James, Senior Judge of the Court of Common Pleas of Allegheny County, Court Room 707, City County Building, 414 Grant Street, Pittsburgh, PA 15219. You are hereby notified to appear and be heard.

Very truly yours,



Ronald L. Hicks, Jr.

RLHjr/rac

Enclosure

MUS2363396.1